

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Investigation by the Department on its own motion,)
pursuant to G.L. c.159 § § 12 and 16, into the)
collocation security policies of Verizon New)
England Inc. d/b/a Verizon Massachusetts)

D.T.E. 02-8

PETITION TO INTERVENE OF VERIZON MASSACHUSETTS

Pursuant to 220 C.M.R.1.03(1) of the Rules of Practice and Procedure of the Department of Telecommunications and Energy (“Department”), Verizon Massachusetts (“Verizon MA”) hereby petitions the Department for leave to intervene as a party in this proceeding. As grounds for its Petition, Verizon MA states as follows:

1. Verizon MA is a common carrier offering intraLATA telecommunications services, including exchange and exchange access services, in the Commonwealth of Massachusetts. The Company’s business address is 185 Franklin Street, Boston, Massachusetts 02110.

2. On January 24, 2002, the Department opened an investigation to examine Verizon MA’s collocation security policies in light of heightened security concerns after the events of September 11, 2001, *i.e.*, the terrorist attacks in New York City. *Order to Investigate*, at 1. The Department previously established security procedures in D.T.E. 98-57. The Department will review its “prior findings with respect to access by personnel of other carriers to Verizon’s central offices and other facilities” (*e.g.*, remote terminals) and “assess the security measures in place to protect those facilities.” *Id.* at 2, 6. The Department also intends “to determine, through

the presentation of evidence, which policies, if any, should be strengthened to safeguard telecommunications networks from tampering” and “whether certain of our policies should be modified to ensure that reliable service to competing telecommunications service providers, businesses, and residents of the Commonwealth is not unreasonably at risk.” *Id.* at 2, 6.

3. In this investigation, the Department will determine whether Verizon’s security policies meet the statutory standard for “just, reasonable, safe, adequate and proper regulations and practices” under Massachusetts General Laws c. 159, § 16. *Id.* at 6-7. Specifically, this investigation will include, but not be limited to, an examination of the following issues: (1) the extent and nature of appropriate access by personnel of other carriers to Verizon’s central offices and other facilities for accessing collocation sites; (2) whether cageless collocation arrangements remain an acceptable security risk; (3) the adequacy of security measures implemented in Verizon’s central offices and other facilities, focusing on preventive, rather than “after-the-fact,” measures; and (4) any other related security issues. *Id.* at 7.

4. The issues raised in this proceeding are a matter of concern to Verizon MA and directly affect its interests. Moreover, Verizon MA’s rights will be substantially and specifically affected by the outcome of this proceeding. Therefore, the Company’s interests cannot be adequately represented without the Department granting this Petition.

5. All correspondence and other communications regarding this proceeding should be served on counsel for Verizon MA. In addition, Verizon MA requests that all materials in this case also be served on the following individual:

Barbara Landry, Specialist
125 High Street, 11th Floor
Boston, Massachusetts 02110
email: barbara.landry@verizon.com
Tel: (617) 743-5252
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WHEREFORE, Verizon MA requests leave to intervene in the proceeding with all the rights of participation as a full party.

Respectfully submitted,

VERIZON MASSACHUSETTS

Its Attorney,

Barbara Anne Sousa
185 Franklin Street, Rm. 1403
Boston, Massachusetts 02110-1585
(617) 743-7331

Dated: February 11, 2002

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APPEARANCE OF COUNSEL

In the above-captioned proceeding, the undersigned hereby appears for and on behalf of Verizon Massachusetts.

Respectfully submitted,

VERIZON MASSACHUSETTS

By its attorney,

Barbara Anne Sousa
185 Franklin Street, Room 1403
Boston, Massachusetts 02110-1585
(617) 743-7331

Dated: February 11, 2002